

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

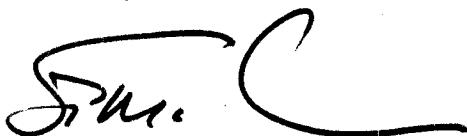
IN RE PHARMACEUTICAL INDUSTRY )  
AVERAGE WHOLESALE PRICE ) MDL NO. 1456  
LITIGATION ) Civil Action No. 01-12257-PBS  
 )  
 )  
THIS DOCUMENT RELATES TO: )  
 )  
International Union of Operating ) Civil Action No. 04-11503-PBS  
Engineers, Local No. 68 Welfare )  
Fund v. AstraZeneca PLC at al. )  
 )  
 )

**DEFENDANT NOVARTIS PHARMACEUTICALS CORPORATION'S  
CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)**

Pursuant to Local Rule 16.1(D)(3), defendant Novartis Pharmaceuticals Corporation, and its undersigned attorneys, hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, for the captioned litigation, and have conferred to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Dated: April 6, 2005

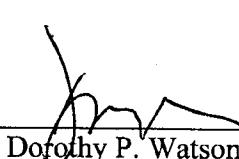
By its attorneys:



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NOVARTIS PHARMACEUTICALS CORPORATION

By

  
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**Certificate of Service**

I, Benjamin M. Stern, certify that pursuant to Court Management Order No. 2, I caused a copy of the foregoing document to be posted on Verilaw for electronic service to counsel of record in this action on this 7<sup>th</sup> day of April 2005.

/s/ Benjamin M. Stern  
Benjamin M. Stern